

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

Richard H. Wyron (admitted *pro hac vice*)  
Columbia Center  
1152 15th Street, N.W.  
Washington, D.C. 20005-1706  
Telephone: (202) 339-8400  
Facsimile: (202) 339-8500

- and -

John Ansbro  
Courtney M. Rogers  
666 Fifth Avenue  
New York, New York 10103  
Telephone: (212) 506-5000  
Facsimile: (212) 506-5151

*Counsel to Hella KGaA Hueck & Co., Hella Corporate  
Center USA, Inc., and Certain Affiliated Entities and  
Behr-Hella Thermocontrol GmbH Co.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11</b>
	:
<b>GENERAL MOTORS CORPORATION, et</b>	: <b>Case No. 09-50026 (REG)</b>
<b>al.,</b>	:
	: <b>(Jointly Administered)</b>
<b>Debtors.</b>	:
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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND DOCUMENTS**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

PLEASE TAKE NOTICE that the undersigned appears as counsel to Hella KGaA Hueck & Co., Hella Corporate Center USA, Inc., and certain affiliates (collectively, the “**Hella Entities**”) and Behr-Hella Thermocontrol GmbH Co. (“**BHTC**”) (the Hella Entities and BHTC together, the “**Entities**”), creditors and parties-in-interest herein and, pursuant to 11 U.S.C. §

1109(b) and Federal Rules of Bankruptcy Procedure 2002 and 9010(b), hereby request that all notices given or required to be given in this case be given and served upon:

Richard H. Wyron  
Orrick, Herrington & Sutcliffe LLP  
Columbia Center  
1152 15th Street, N.W.  
Washington, D.C. 20005-1706  
Telephone: (202) 339-8400  
Facsimile: (202) 339-8500  
Email: rwyron@orrick.com

- and -

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Courtney M. Rogers  
Orrick, Herrington & Sutcliffe LLP  
666 Fifth Avenue  
New York, New York 10103  
Telephone: (212) 506-5000  
Facsimile: (212) 506-5151  
Email: jansbro@orrick.com  
crogers@orrick.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned Debtors (the “**Debtors**”) or the property of or in the possession, custody or control of the Debtors or which is otherwise filed or given with regard to the above-referenced case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core

matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to the Entities' rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtors and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 3017(a), the Entities further request that all plans and disclosure statements filed herein by any party be duly served upon the Entities' undersigned counsel.

Dated: June 16, 2009  
New York, New York

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

By: /s/ Richard H. Wyron  
Richard H. Wyron (admitted *pro hac vice*)  
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